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Attorney for Debtor(s)

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In Re: : UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Yulissa Paredes : HONORABLE John K. Sherwood

: CHAPTER 13

Debtor (s) : Case No. 24-14079

: Hearing Date: June 13, 2024 at 10:00 A.M.

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**NOTICE OF MOTION TO CONVERT CHAPTER 11 BANKRUPTCY TO CHAPTER 13  
BANKRUPTCY**

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PLEASE TAKE NOTICE that the undersigned, Russell L. Low, Esq., attorney for the Debtor (s), Yulissa Paredes will apply to the United States Bankruptcy Court, District of New Jersey 50 Walnut Street Newark, NJ 07102 Courtroom 3D on Thursday, June 13, 2024 at 10:00 A.M., for an Order on Motion to Convert chapter 11 Bankruptcy to Chapter 13 Bankruptcy. In support of the above Motion, Debtors will rely upon the Certification attached hereto, and oral argument. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one, in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to convert the case to a Chapter 13 or if you want the Court to consider your views on the Motion, then on or before the time period set by the Court, you or your attorney must:

File with the Court a written response, an answer, explaining your position at:

Clerk  
United States Bankruptcy Court  
District of New Jersey  
50 Walnut Street  
Newark NJ 07102

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

You must also mail a copy to:

Russell L. Low, Esq.  
LOW & LOW, LLC.  
505 Main Street, Suite 304  
Hackensack, New Jersey 07601  
Attorney for Debtors

Fran B. Steele  
U.S. Department of Justice  
Office of the US Trustee  
One Newark Center  
Suite 2100  
Newark, NJ 07102

Attend the hearing scheduled to be held at a time to be set by the Court in the United States Bankruptcy Court, 50 Walnut Street Newark NJ 07102 Courtroom 3D before the Honorable John K. Sherwood.

TAKE FURTHER NOTICE that reliance will be made upon the attached Certification.

TAKE FURTHER NOTICE that answering papers and briefs, if necessary, or a statement that no answering brief is necessary and the basis thereof, shall be filed seven (7) days before the

date noticed for argument or as otherwise ordered by the Court. This Motion shall be deemed uncontested unless responsive papers are filed within seven (7) days from the date of this Motion and state with particularity the basis for the opposition, unless otherwise ordered by the Court.

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY**

**IN ACCORDANCE WITH D.N.J. LBR 9013-02**

This Motion requests an Order converting the Debtor's chapter 11 Bankruptcy to a Chapter 13 Bankruptcy.

The facts relied on by the Debtor's/Petitioner that are set forth in Counsel's Certification filed in support of the Motion do not present complicated questions of fact or unique questions of law. Therefore, no brief is necessary for the Court's consideration of this Motion.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Motion and may enter an Order converting the chapter 11 Bankruptcy to a Chapter 13 Bankruptcy as requested by the debtor(s).

Dated: May 23, 2024

/s/ RUSSELL L. LOW  
**RUSSELL L. LOW, ESQ.**  
Attorney for Debtor